## UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:

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Chapter 11

Chapter 11

ATECH (PARENT) RESOLUTION CORP, S
Case No. 24-12796 (LSS)

et al., 1

Debtors.

Re. D.I. 825

## QORVO, INC.'S RESPONSE AND RESERVATION OF RIGHTS TO JOINT CHAPTER 11 PLAN OF ATECH (PARENT) RESOLUTION CORP AND ITS DEBTOR AFFILIATES

Qorvo, Inc. ("Qorvo"), through its undersigned counsel, hereby files this response and reservation of rights to the Joint Chapter 11 Plan of Atech (Parent) Resolution Corp and its Debtor Affiliates [D.I. 825] (the "Plan"), and respectfully states as follows:

## **RESPONSE AND RESERVATION OF RIGHTS**

1. Qorvo invested significant time and expense in negotiating the Plan with the Debtors and the Creditors' Committee, a key component of which is the initial distribution contemplated by the Plan. After the Plan was filed, Debtors amended their schedules, which triggered a new deadline for certain potential claimants to file claims. Eight claims were filed. The Debtors subsequently filed their *Motion for Entry of an Order Under Section 502(c) of the Bankruptcy Code Estimating Certain Claims for Purposes of an Initial Distribution* [D.I. 860] (the "Estimation Motion"), to estimate those eight claims at zero to facilitate the initial distribution contemplated by the Plan. Qorvo is informed and believes that the Creditors' Committee intends to join in the Estimation Motion.

Mark D. Podgainy.

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<sup>&</sup>lt;sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: ATech (Parent) Resolution Corp. (9046), ATech Resolution Corp. (5617), GD Chips Resolution Corp. (f/k/a Grinding and Dicing Services, Inc.) (7929), and RF Chips Resolution Corp. (1138). The Debtors' mailing address is c/o Getzler Henrich & Associates LLC, 295 Madison Avenue, 20th Floor, New York, NY 10017, Attn:

- 2. Qorvo is supporting the Plan and has submitted a ballot in favor of and accepting the Plan. Qorvo has **not** opted in to any third party releases. Qorvo's support for the Plan is based upon the Debtors' and Creditor Committee's representations to Qorvo that they will prosecute the Estimation Motion.
- 3. Qorvo reserves all of its rights, remedies and power, including, without limitation, to make any arguments at the Plan confirmation hearing.

Dated: December 3, 2025 Wilmington, Delaware Respectfully submitted,

## PASHMAN STEIN WALDER HAYDEN, P.C

/s/ John W. Weiss

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